

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

---

21 MC 102 (AKH)

KRZYSZTOF ZALEWSKI (and wife, DANUTA  
ZALEWSKA),

07-CV-5330 (AKH)

Plaintiffs,

-against-

100 CHURCH LLC, ET AL.,

Defendants.

---

**NOTICE OF ADOPTION BY  
ZAR REALTY  
MANAGEMENT CORP. OF  
ANSWER TO MASTER  
COMPLAINT**

**PLEASE TAKE NOTICE** that defendant **ZAR REALTY MANAGEMENT CORP.** **n/k/a SAPIR REALTY MANAGEMENT CORP.** for the building located at 100 Church Street, (hereinafter "Zar/Sapir") as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, herein adopt Zar/Sapir's Answer to Master Complaint, dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

**WHEREFORE**, Zar/Sapir demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 7, 2007

**HARRIS BEACH PLLC**

*Attorneys for Defendant*

ZAR REALTY MANAGEMENT CORP. n/k/a  
SAPIR REALTY MANAGEMENT CORP.

/s/

---

Stanley Goos, Esq. (SG 7062)  
100 Wall Street, 23<sup>rd</sup> Floor  
New York, New York 10005  
(212) 687-0100

TO:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

***Liaison Counsel for Plaintiff***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102

Thomas Egan, Esq.  
Flemming Zulack Williamson Zauderer LLP  
One Liberty Plaza  
New York, New York 10006

***Liaison Counsel for the Defendants***

All Other Defense Counsel

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on September 7, 2007, I caused the following document to be electronically via the Court's ECF system:

1. Notice of Zar Realty Management Corp. n/k/a Sapir Realty Management Corp.'s Adoption of Answer to Master Complaint.

The undersigned further certifies that on September 7, 2007, I caused the aforesaid documents to be served via First Class Mail upon the following:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

***Liaison Counsel for Plaintiffs***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102

Thomas Egan, Esq.  
Flemming Zulack Williamson Zauderer LLP  
One Liberty Plaza  
New York, New York 10006

***Liaison Counsel for the Defendants***

Dated: September 7, 2007

\_\_\_\_\_  
/s/  
Stanley Goos, Esq. (SG 7062)